

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of
Telecommunications and Energy on its own motion
pursuant to G.L. c. 159, §§ 12 and 16, into Verizon
New England Inc., d/b/a Verizon Massachusetts'
provision of Special Access Services.

D.T.E. 01-34

**WORLDCOM'S AND AT&T'S FIRST SET OF INFORMATION
REQUESTS TO VERIZON**

WorldCom, Inc., and AT&T Communications of New England, Inc., hereby submit to Verizon Massachusetts ("Verizon") the following information requests. The Department's Ground Rules concerning information requests are incorporated herein by reference.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Please refer to the definitions below in providing responses.

8. All uses of the conjunctive include the disjunctive and vice versa. Words in the singular include the plural and vice versa.
9. Unless otherwise indicated, your responses should cover the period from January 1, 1998, to the present.
10. Each response should identify documents sufficient to demonstrate the grounds of the response. Copies of such documents, with clear indication of the particular question to which each document or group of documents is responsive, may be produced in lieu of such identification.
11. For each response, provide a detailed explanation of the methodology used to calculate the response, including the system(s) from which the data was extracted; any data included/excluded from the calculation; and the methodology and/or calculations used.
12. If you cannot answer a question or any portion of a question, answer what portions you can answer and provide a detailed explanation as to why the remainder cannot be answered. If you cannot answer a question or portion of a question because you do not compile data or keep records in a manner that permits you to answer the question, (a) state that as the reason and provide a detailed description of the manner in which you do compile the requested data or records; and (b) provide the best available data or information in whatever format it is kept.
13. Where indicated, the content of your answers should be separately broken out by:
 - a. Report Dimensions
 - (i) Verizon Retail
 - (ii) Non Affiliated Carriers Aggregate
 - (iii) Affiliated Carriers Aggregate
 - b. Service Disaggregation for each Report Dimension
 - (i) Interstate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:
 - (a) FCC 11
 - (b) FCC Other

(ii) Intrastate DS0, DS1, DS3, OCn by tariff under which the circuits (as defined in Instruction No. 14) have been ordered, including but not limited to:

(a) D.T.E. 10

(b) D.T.E. 15

(c) D.T.E. Other

14. Any request for the number of circuits for any time period (*e.g.*, circuits ordered or requested, or circuits installed or completed) refers to facilities (DS0, DS1, Ds3, OCn) over which special services of any kind may be provided, regardless of the tariff under which the service is ordered.

Definitions

ASR means Access Service Request.

Affiliated Carrier means a carrier customer of Verizon that is affiliated with Verizon.

CATC means Carrier Account Team Center.

Central Office (“CO”) means a building in a wire center area where switching and other equipment and facilities are found.

Completion interval means the time in business days or average business days for a special service order to be completed after Verizon has received an “executable service request” (see definition below).

Customer not ready (“CNR”) means a situation where a new special services installation (see definition below) cannot be completed by Verizon by the due date, through no fault of Verizon, but because the customer or a connecting carrier is not ready for the installation to be completed. Such a situation must be coded CNR by the Verizon for it to be counted as a CNR.

Customer service record (“CSR”) means a record maintained by Verizon that has customer service details and that is commonly referred to as a CSR.

Due date means the committed date communicated by Verizon to the customer on the “FOC” (see definition below) or otherwise by which Verizon agrees to complete the order.

Executable service request (a good ASR or clean ASR) means a request by ASR, or any other form of special services request, adequate for Verizon to create a service order.

Firm order commitment (“FOC”) means Verizon’s response to an initial or supplemental ASR which provides the requesting customer with the specific date by which the requested order will be completed.

Installation trouble report means a trouble report where a trouble was found in Verizon’s network within 30 days of order completion.

ICO means Independent Company.

IOF means Inter-office facilities.

Internet Service Provider (“ISP”) means, unless otherwise indicated, an Internet Service Provider not affiliated with Verizon.

Interexchange Carrier (“IXC”) means, unless otherwise indicated, an Interexchange Carrier not affiliated with Verizon.

Jeopardy situation means a situation in which Verizon changes the due date after having offered or agreed to a due date.

New special services installation means (1) an installation for a customer to whom no special services (see definition below) have been previously installed and (2) additions to existing special services installations.

Non-affiliated carrier or **CLEC** means a Competitive Local Exchange Carrier not affiliated with Verizon.

Non-executable service request means a request by ASR, or other form of special services order, or request for special services that is not adequate for Verizon to create a service order.

On-line means using a gateway or access through the Internet.

On-time installation means a special service installation completed as verified by Verizon’s customer on or before the first confirmed due date, or by a subsequent customer initiated and verified change in the order due date.

Outside Plant (“OSP”) means loop transmission facilities generally used to describe the path between the customer’s premises and the CO.

Past due order means an uncompleted order for which the committed due date has passed.

Policies and practices relating to employees means any policy, practice or goal relating to employee evaluation, promotion, retention, or compensation.

Special services means any service dedicated to a customer that requires circuit design including, but not limited to, any service with four wires; and any DS0, DS1, DS3 or OCn.

Trouble report means any customer direct or referred report of impaired service or an out-of-service condition where the trouble was found to be in Verizon’s network or a trouble condition was not found.

Verizon Retail means an end-user that purchases any special services (as defined above) directly from Verizon under any tariff.

INFORMATION REQUESTS

1. For each report dimension and service disaggregation indicated in Instruction 13, state Verizon's annual revenues for special services from 1998 to the present.
2. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of circuits (as defined in Instruction No. 14) ordered or requested from Verizon, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
3. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state the number of circuits (as defined in Instruction No. 14) that Verizon completed each month, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
4. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to WCOM/ATT-VZ 1-3 that were installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
5. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to WCOM/ATT-VZ 1-3 that were not installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders. Please state:
 - (a) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date for Verizon reasons, including but not limited to, lack of Verizon facilities, Verizon personnel, or other reasons for which Verizon was responsible;
 - (b) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date as a result of CNR.
6. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, as of the end of each month, provide the number of uncompleted circuits (as defined in Instruction No. 14) categorized by "age" (defined as the number of business days since an executable service request was received). Please exclude disconnects, Verizon test orders, Verizon administrative orders and records only orders. Provide age

groups as follows: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 days, and 40+ days.

7. For each of your answers to Questions 5 and 6, and all broken-out subparts thereto, provide the ground(s) asserted by Verizon for failing to complete the order on the due date including, but not limited to:
 - (a) lack of Verizon IOF facilities,
 - (b) lack of Verizon OSP or Loop facilities;
 - (c) lack of Verizon CO;
 - (d) due to Verizon CPC, Verizon CATC, or Verizon Dispatch; and/or
 - (e) other reasons for which Verizon was responsible; or
 - (f) CNR.
8. Provide the original planned capital investment, and actual capital expenditures by Verizon for the years 1997 through 2000 relating to the construction and installation of facilities (*e.g.*, OSP, IOF, CO equipment) over which special services could be provided. Describe in detail any and all current plans (including projections of annual capital expenditures by Verizon for the budget years 2001 and 2002) relating to the installation of new facilities over which special services can be provided. Your answer should include, but is not limited to, the information Verizon presented to the New York Public Service Commission, Case 00-C-2051, at the December 21, 2000 Technical Conference. A copy of Verizon's presentation, entitled "Special Services Performance Improvement Plan (Overview)," is attached hereto.
9. For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies, or practices establishing priorities for assigning facilities (including but not limited to Verizon IOF, OSP, CO equipment) among:
 - (a) circuits (as defined in Instruction No. 14) ordered or requested by CLECs, IXC's and ISPs;
 - (b) circuits (as defined in Instruction No. 14) ordered or requested by Verizon retail customers and affiliated carriers;
 - (c) circuits ordered by CLECs/ICOs for Network Interconnection with Verizon;
 - (d) circuits ordered by Verizon for Network Interconnection with CLECs/ICOs;

- (e) circuits ordered by Verizon or Verizon affiliates to build or augment their own networks including but not limited to local, LD, Data or Ip networks when all circuits (as defined in Instruction No. 14) ordered or requested cannot be completed by the due date due to lack of Verizon facilities.
- 10. In order for Verizon to meet the demand generated by each report dimension and service disaggregation indicated in Instruction 13:
 - (a) separately describe any processes, policies, or practices for obtaining and responding to demand forecasts from (i) Verizon retail customers; (ii) non affiliated carriers aggregate; and (iii) affiliated carriers aggregate;
 - (b) separately describe any processes, policies, or practices for obtaining and responding to Verizon's own demand forecasts.
 - (c) separately describe the process Verizon uses to aggregate all forecasts and state whether Verizon allocates capital to, and builds to meet, the aggregate demand from all forecast inputs.
- 11. For each report dimension and service disaggregation indicated in Instruction 13, describe Verizon's policies, practices, and processes for handling non-executable service requests, *e.g.*, if Verizon uses the query process for carrier customers, please describe the process that Verizon uses with its retail customers.
- 12. For each report dimension and service disaggregation indicated in Instruction 13, describe Verizon's policies, practices, and processes for obtaining data from each of the categories of customers in the report dimensions so that an executable service request can be created in the format required by Verizon, including but not limited to:
 - (a) identifying any instruction or materials provided by Verizon to CLECs, IXC's or ISPs;
 - (b) any organizations, centers, and titles of individuals involved in any such processes; and
 - (c) whether steps in the various processes are performed manually or electronically.
- 13. For each report dimension and service disaggregation indicated in Instruction 13:
 - (a) describe any policies, practices and processes Verizon uses to define a CNR situation and to determine that a past due order is properly coded CNR; and

- (b) describe any policies, practices and processes relating to documenting or reporting a CNR situation for past due orders.
- 14. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of past due orders coded CNR, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.
- 15. For each report dimension and service disaggregation indicated in Instruction 13, describe any policies, practices and processes Verizon uses to prevent a CNR situation. Your response should include, but not be limited to:
 - (a) a description of the activities in which technicians engage (*e.g.*, please state whether technicians call the customer before attempting installation; if so, please state when such a call is made. Please state whether Verizon calls the ordering carrier if a customer is not ready; if so, please state whether the call is made from the customer's premises).
 - (b) a description of any changes made to the CNR process over the past three years and the date(s) on which such changes were implemented;
 - (c) a description of any training material(s) or customer notification(s) regarding the CNR process.
- 16. For each report dimension and service disaggregation indicated in Instruction 13, state for each month the average number of business days before Verizon committed to an order due date in a FOC, or by any other means, once an executable service request was received. If Verizon does not provide a FOC for its retail customers and its affiliated carrier customers, explain in detail:
 - (a) how Verizon notifies retail customers and affiliated carrier customers of the committed due date, and
 - (b) the internal process through which such due date is generated and provided.
- 17. For each report dimension and service disaggregation indicated in Instruction 13, describe:
 - (a) how Verizon establishes due dates and communicates those due dates to the customer;

- (b) the process by which facility checks are performed prior to establishing and/or communicating such due dates;
 - (c) whether any part of the process for establishing a due date involves negotiations with the customer. If so, please explain in detail the nature of those negotiations.
 - (d) any changes Verizon has made over the past three years to the process for establishing a due date and the date(s) on which such changes were implemented;
 - (e) any policies, practices and processes concerning how and when Verizon notifies customers (including CLEC end users) that a jeopardy situation may occur. Please state for each month the average number of business days in advance of the original due date by which customers are informed of the possible jeopardy situation.
 - (f) describe any policies, practices and processes concerning how and when Verizon notifies customers (including CLEC end users) that a jeopardy situation has occurred. Please state for each month the average number of business days in advance of the original due date by which customers are informed of the jeopardy situation.
 - (g) any policies, practices and processes concerning how and when Verizon negotiates a new due date with customers (including CLEC end users) when a jeopardy situation may, will or has occurred.
 - (h) any training materials and/or notification provided to employees regarding the policies, practices, or processes requested in (e) – (g).
18. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
- (a) the average installation interval; and
 - (b) the average number of business days between the date on which an executable service request was received and the due date committed to by Verizon.
19. For each report dimension and service disaggregation indicated in Instruction 13, describe any policies and practices relating to on-time installations, past due installations, and maintenance and repair with respect to, but not limited to, the following:

- (a) documenting and reporting;
 - (b) employees; and
 - (c) payments or credits to the various categories of customers.
- 20. For each report dimension and service disaggregation indicated in Instruction 13, describe any policies and practices relating to installation intervals for new special services with respect to, but not limited to, the following:
 - (a) documenting and reporting;
 - (b) employees;
 - (c) and payments or credits to the various categories of customers.
- 21. For each report dimension and service disaggregation indicated in Instruction 13, describe any policies or practices relating to complaints by any customer concerning Verizon's performance (including but not limited to escalations) about new special service installations with respect to, but not limited to, the following:
 - (a) documenting and reporting;
 - (b) employees; and
 - (c) payments or credits to the various categories of customers.
- 22. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
 - (a) the number of installation trouble reports received; and
 - (b) the amount of credits or payments issued to the various categories of customers.
- 23. For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies or practices relating to installation trouble reports, including, but not limited to:
 - (a) documenting and reporting;
 - (b) employees, and
 - (c) payments or credits issued to the various categories of customers.

24. For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:
- (a) the number of trouble reports after new installations; and
 - (b) the amount of credits or payments issued to the various categories of customers.
25. For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies or practices relating to trouble reports after new installations, including, but not limited to:
- (a) documenting and reporting;
 - (b) employees; and
 - (c) payments or credits to the various categories of customers.
26. For each report dimension and service disaggregation indicated in Instruction 13, and at a minimum for: (1) Verizon Retail; (2) Non-affiliated carriers aggregate; and (3) Affiliated carriers aggregate, describe any Verizon policies, practices, and processes that enable such customers to review and/or retrieve on-line at no charge:
- (a) customer service records;
 - (b) status of pending service requests;
 - (c) design layout records of special services circuits (as defined in Instruction No. 14) ;
 - (d) circuit details including assigned and spare ports;
 - (e) current and previous bills;
 - (f) usage patterns;
 - (g) information on product availability and product descriptions; and
 - (h) state whether any such processes, policies or practices vary according to the type of Service Disaggregation for each Report Dimension specified in Instruction 13, subsection b.
27. SBC Communications, Inc. (“SBC”) and Verizon have stated that special access and private line services “belong in the same market” because both types of services “use the same facilities and are technically equivalent” and both “are provided by the same vendors to the same group of customers (predominantly

large businesses).” *See* Comments of SBC and Verizon, at 13 n.32, *In the Matter of: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket 96-98 (dated April 5, 2001). State whether the Verizon agrees with each portion of this statement. Explain in detail the basis of your answer.

Respectfully submitted,

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